

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

PROTESTERS IN SUPPORT OF BLACK LIVES <i>et al.</i>)	
)	No. 20-CV-06851
Plaintiffs,)	
)	
CITY OF CHICAGO <i>et al.</i> ,)	Honorable Charles R. Norgle
)	Magistrate Judge Jeffrey T. Gilbert
Defendants.)	

PLAINTIFFS' UNOPPOSED MOTION TO RESET DEADLINES

Plaintiffs request that this Court reset their deadline to file their Second Amended Complaint to on or before July 16, 2021. The Defendants consent to this motion. In further support of this motion, Plaintiffs state as follows:

1. This case relates to the Chicago Police Department's response to protests that occurred on the streets of Chicago during the summer of 2020. In addition to allegations against individual officers, the Plaintiffs have pled extensive *Monell* allegations against the City of Chicago alleging that the Plaintiffs' harm resulted from the City's policy and practice failures.

2. On April 9, 2021, this Court granted the parties' joint motion to reset deadlines (Doc. 49). The parties' joint motion (Doc. 47) explained that the Plaintiffs required additional time to incorporate *Monell* related allegations from two government reports into their Second Amended Complaint. The joint motion also explained Plaintiff's position that a third report and investigation from the Independent Monitoring Team in the police consent decree litigation will be highly relevant to Plaintiffs' *Monell* claims. See *State of Illinois v. City of Chicago*, 17-cv-6260, Notice Regarding Special Report, Dkt. 839. The parties' joint motion also indicated that the Defendants will not object to the Plaintiffs' Motion for leave to file a Second Amended Complaint.

3. As of today, the Independent Monitor's report has not yet been released publicly. The Plaintiffs therefore require additional time to incorporate the monitor's anticipated findings into their complaint. While the Plaintiffs are currently unaware of exactly when the Monitor's findings will be released, they believe, based upon information and belief, that the report will be forthcoming within the next few weeks.

Wherefore, for the reasons set forth herein, the Plaintiffs respectfully request the following:

- a. That Plaintiffs be given leave to file an Unopposed Motion for Leave to File a Second Amended Complaint on or before July 16, 2021;
- b. That, in the event the Court allows Plaintiffs to file their Second Amended Complaint, Defendants be ordered to answer the Second Amended Complaint or otherwise plead 60 days after Plaintiffs file their Second Amended Complaint;
- c. That the date of the court-ordered status report be reset to 30 days after the date on which Defendants file their responsive pleading to the Second Amended Complaint; and
- d. For such other relief as the Court may deem just.

Respectfully Submitted:

/s/ Sheila A. Bedi
One of Plaintiff's Attorneys

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